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The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MARY LOU GRANDE and MARK
DOUGLAS GRANDE,

Plaintiffs,

vs.

US BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR LEHMAN XS TRUST
MORTGAGE PASS-THROUGH
CERTIFICATES SERIES 2007-7 ("US
BANK"), AND NATIONSTAR MORTGAGE
LLC D/B/A MR. COOPER, QUALITY LOAN
SERVICE CORPORATION OF
WASHINGTON and Doe Defendants 1 through
20,

Defendants.

No. 2:19-cv-00333-MJP

SUPPLEMENTAL DECLARATION OF
CHRISTINA L HENRY IN SUPPORT
OF REPLY TO PLAINTIFFS' REQUEST
FOR ATTORNEYS' FEES AND COSTS
RE MOTION TO COMPEL

Note on Motion Calendar:

January 31, 2020

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1 I, Christina L Henry, declare as follows:

2 1. I am one of the attorneys for the Plaintiffs Mary Lou Grande and Mark Douglas
3 Grande. I have personal knowledge of the facts as stated herein and can testify that they are
4 true and correct to the best of my knowledge at this time.

5 2. In correspondence with Defendant's attorney, Christopher G Varallo in late
6 July 2020, I made it clear that the deadlines in this case were tight and that the Plaintiffs would
7 agree to a response date of August 22, 2019 instead of the August 30, 2019 date proposed,
8 and that we were already looking for agreeable dates to depose their Rule 30(b)(6) deponent
9 in September. The emails regarding these exchanges in July 2010 are attached hereto as
10 **Exhibit 1.**

11 3. Thereafter, on August 15, 2019, when I received another request for a
12 discovery extension, I questioned whether the other attorney on the case could assist because
13 further delay would hinder our efforts to meet other discovery deadlines in the case. As
14 documented in the email chain, I discussed the issue with Dan Gibbons on the phone and
15 followed up with an email memorializing the conversation and my concerns. Thereafter, Ms.
16 Huelsman added additional concerns separately regarding the staffing of three attorneys on
17 the case but still insisting that the discovery deadlines could not be met. After a thorough
18 review of my files and emails, I do not see any duplication of time with Ms. Huelsman. The
19 emails regarding these exchanges in August 2019 are attached hereto as **Exhibit 2.**

20
21 SIGNED under penalty of perjury under the laws of the State of Washington at Seattle,
22 Washington, this 12th day of March 2020.

23 By: /s/ Christina L Henry
24 Christina L Henry, WSBA # 31273
25 Attorney for the Plaintiffs
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